

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

JOSHUA WARREN,

Plaintiff,

v.

MOUNT ETNA PARTNERS, LLC,

RONALD BLACKBURN and

GARRETT REINCKE,

Defendants.

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CASE NO: 3:21-cv-05091-MDH

STATUS REPORT OF JOSHUA WARREN

Comes now Plaintiff, Joshua Warren, and for his response to this Court's Order For
Status Report of March 14, 2023 (Doc. #26) states as follows:

1. Until recently, it was uncertain whether Plaintiff would be proceeding to attempt collection on the judgment against Defendant Reincke, or whether the judgment would be set aside. This Court's Order of February 23, 2023 resolved that issue. In addition, more than thirty days have now passed since the Court's Order on that date. Plaintiff will now be proceeding with attempts to execute on his default judgment against Defendant Reincke.
2. With respect to Defendants Mount Etna, LLC and Ronald Blackburn, Plaintiff had previously attempted to locate Defendant Blackburn and serve process upon him. These efforts were detailed in Plaintiff's Response to Order To Show Cause, filed August 1, 2022 (Doc. #11). At that time, Plaintiff noted that "investigation and collection attempts on the requested Judgment against Defendant Reincke may lead to information regarding the whereabouts of Defendant Blackburn, who is his co-owner

in American Fibrex.” Thereafter, Plaintiff proceeded in his attempt to obtain a judgment against Defendant Reincke, which resulted in the entry of judgment on November 3, 2022. Thereafter, Plaintiff was in the process of proceeding on collection in Florida when Reincke filed his Notice of Appeal on November 28, 2022. This ended attempts at that time to pursue post judgment proceedings against Reincke, and any concomitant attempt in the course of that effort to obtain information about Defendant Blackburn.

3. Now that the judgment against Defendant Reincke is final, those efforts to foreclose have begun anew. We expect to undertake pursuit of foreclosure and other post judgment remedies in the next several months. It is our belief that these proceedings against Defendant Reincke, now that they can begin in earnest, may yield the requested information.
4. In addition. Plaintiff will retain the services of a new skip tracer other than ABC Legal to locate a service address for Defendant Blackburn. Plaintiff proposes that this Court allow Plaintiff ninety (90) days in which to make progress on these issues. Once a viable service address is obtained, new summonses will be requested.
5. The status of Mt. Etna Partners, LLC in this case, set forth in Plaintiff’s Response to Order to Show Cause (Doc. # 11) has not changed.

Respectfully submitted,

BUCHANAN WILLIAMS & O'BRIEN, P.C.

// s // Andrew S. Buchanan
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished by ECF
Filing to all parties of record this 31st day of March 2023.

By: /s/ Andrew S. Buchanan